Attorney Docket No.: Q79959

RESPONSE UNDER 37 C.F.R. § 1.116 Application No.: 10/782,852

## REMARKS

Claims 1, 10, 13, 14 and 16-24 are all the claims pending in the application.

Claims 1, 10, 13-14, 16-18 and 20-24 are rejected under 35 U.S.C. § 103(a) as being assertedly unpatentable over EP 1 235 107 to Aoshima ("EP '107") in view of U.S. Patent 5,71,619 ("Aoshima"), and in further view of U.S. Patent 5,866,298 ("Iwamoto").

Applicants respectfully traverse the rejection.

EP '107 relates to a planographic printing plate. A planographic printing plate is required to have high durability (ink resistance and wear resistance) with respect to the repeated printing process.

In contrast, Iwamoto (US 5,866,298) relates to a color filter. A color filter is not required to have such high durability (ink resistance and wear resistance) as a planographic printing plate.

Iwamoto teaches that the addition of an organic acid increases the solubility of the coating of the composition for a color filter to reduce residual insoluble matters in an unexposed area.

However, if such an organic acid was added to a composition for a planographic printing plate, the durability (ink resistance and wear resistance) of the resulting planographic printing plate would be decreased.

Therefore, a person having ordinary skill in the art would not have been motivated to apply Iwamoto's teaching (that is, the addition of an organic acid to a composition for a color filter) to the composition for a planographic printing plate of Aoshima.

Accordingly, the present invention is not rendered obvious and Applicants respectfully request withdrawal of the rejection.

Claim 19 is rejected under 35 U.S.C. § 103(a) as being unpatentable over EP '107 in view of Aoshima and Iwamoto, and further in view of U.S. 6,476,092 ("Kunita").

Applicants respectfully traverse the rejection.

Aoshima does not relate to a so-called "radical polymerization type negative planographic printing plate precursor" as in the present invention and EP '107. This can be understood from the fact that a polymerizable compound having at least one ethylenically unsaturated double bond, which is an essential component in a radical polymerization type negative planographic printing plate precursor, is not used in the working examples of Aoshima. Therefore, since Aoshima is based on a different image formation mechanism from that of EP '107, a person having ordinary skill in the art would not have been motivated to combine Aoshima with EP '107.

Further, a binder polymer wherein  $R^2$  is a chain structure is not used in the working examples of Aoshima, but is merely described as a usable binder polymer in the specification of Aoshima. There is no apparent reasons for one of ordinary skill in the art to employ a binder polymer wherein  $R^2$  is a chain structure as there is no teaching or suggestion that would lead one of ordinary skill in the art specifically to a binder polymer wherein  $R^2$  is a chain structure. Therefore, a person having ordinary skill in the art would not have been motivated to apply a binder polymer wherein  $R^2$  is a chain structure to EP '107 based on the teachings of the references.

Accordingly, Applicants respectfully request withdrawal of the rejection.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the

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Examiner feels may be best resolved through a personal or telephone interview, the Examiner is

kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue

Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any

overpayments to said Deposit Account.

Respectfully submitted,

//Jennife

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